

### **REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed March 22, 2006. Claims 1-65 were pending in the Application. In the Office Action, Claims 1-65 were rejected. In order to expedite and advance prosecution of this Application, Applicants amend Claim 48, and Applicants cancel without disclaimer or prejudice Claim 49. Thus, Claims 1-48 and 50-65 remain pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

### **SECTION 102 REJECTIONS**

Claims 1, 2, 4 and 48-50 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,555,362 issued to Yamashita et al. (hereinafter "*Yamashita*"). Applicants cancel without prejudice or disclaimer Claim 49, thereby rendering the rejection of Claim 49 moot. Applicants respectfully traverse this rejection for remaining Claims 1, 2, 4, 48 and 50.

Of the rejected claims, Claims 1 and 48 are independent. Applicants respectfully submit that *Yamashita* does not disclose or even suggest each and every limitation of independent Claims 1 and 48. For example, independent Claim 1 recites "receiving a definition of a visible area in the image, the visible area definition having a specification of margins around the image" (emphasis added). In the Office Action, the Examiner asserts that *Yamashita* purportedly teaches receiving a visible area in the image, the visible area definition having a specification of margins around the image (Office Action, page 3 (referring only to figure 6 of *Yamashita*)). Applicants respectfully disagree.

*Yamashita* appears to be directed toward separating objects of a document and laying out the objects in a tree structure (*Yamashita*, abstract, figures 3 and 6). *Yamashita* appears to disclose that the results of image segmentation are displayed in an image window 50, and that a layout model 80 schematically representing the tree structure of the document is displayed in a

model window 60 (*Yamashita*, column 5, lines 41-46). *Yamashita* also appears to disclose that during the segmentation process, white pixel areas of the document are contained within white rectangles, and black pixel areas of the document are contained within black rectangles (*Yamashita*, column 3, lines 35-46, column 4, lines 12-25, figures 3 and 6). However, *Yamashita* does not appear to disclose or even address any area or portion of the document in *Yamashita* outside the white or black rectangles of *Yamashita*. Thus, Applicants respectfully submit that *Yamashita* does not disclose or even suggest “receiving a definition of a visible area in the image” where the visible area specifies “margins around the image” as recited by Claim 1. Accordingly, Applicants respectfully submit that *Yamashita* does not anticipate Claim 1.

Independent Claim 48, as amended, recites a “graphical user interface . . . operable to receive a definition of a visible area having a specification of margins around the image” and “a processor generating an image layout definition comprising the region definition and the visible area definition” (emphasis added). At least for the reasons discussed above in connection with independent Claim 1, Applicants respectfully submit that *Yamashita* also does not anticipate Claim 48.

Claims 2, 4 and 50 that depend respectively from independent Claims 1 and 48 are also not anticipated by *Yamashita* at least because they incorporate the limitations of respective Claims 1 and 48 and also add additional elements that further distinguish *Yamashita*. Therefore, Applicant respectfully requests that the rejection of Claims 1, 2, 4, 48 and 50 be withdrawn.

### **SECTION 103 REJECTIONS**

Claims 12-14 and 58-60 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Yamashita*. Claims 3, 11, 17 and 57 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of U.S. Patent No. 5,767,978 issued to Revankar et al. (hereinafter “*Revankar*”). Claims 5 and 51 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of U.S. Patent No. 6,735,740 issued to Sakai (hereinafter “*Sakai*”). Claims 6 and 52 were rejected under 35 U.S.C. §103(a) as being unpatentable over

*Yamashita* in view of U.S. Patent No. 6,163,623 issued to Ohta (hereinafter "*Ohta*"). Claims 7, 15 and 53 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of U.S. Patent No. 5,822,454 issued to Rangarajan (hereinafter "*Rangarajan*"). Claims 8-10 and 54-56 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Rangarajan* and in further view of *Revankar*. Claims 16, 20, 61 and 64 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Rangarajan* and in further view of U.S. Patent No. 5,999,664 issued to Mahoney et al. (hereinafter "*Mahoney*"). Claims 18, 19, 62 and 63 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Rangarajan* and in further view of *Mahoney* and in further view of U.S. Patent No. 5,848,184 issued to Taylor et al. (hereinafter "*Taylor*"). Claims 21, 42, and 65 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Rangarajan* and in further view of U.S. Patent No. 6,594,030 issued to Ahlstrom et al. (hereinafter "*Ahlstrom*"). Claims 22-24, 33-35 and 43-47 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney*. Claims 25 and 32 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney* and in further view of *Revankar*. Claim 26 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney* and in further view of *Sakai*. Claim 27 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney* and in further view of *Ohta*. Claims 28, 36, 37 and 41 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney* and in further view of *Rangarajan*. Claims 29, 31 and 38 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Rangarajan* and in further view of *Revankar*. Claims 39 and 40 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney* and in further view of *Rangarajan* and in further view of *Taylor*. Claim 42 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney* and in further view of *Rangarajan* and in further view of *Ahlstrom*. Applicants respectfully traverse these rejections.

Claims 3, 5-21 and 51-65 depend respectively from independent Claims 1 and 48. As discussed above, independent Claims 1 and 48 are allowable. Therefore, Claims 3, 5-21 and 51-65 that depend respectively therefrom are also allowable. Moreover, Applicants respectfully submit that *Revankar*, *Sakai*, *Ohta*, *Rangaraja*, *Mahoney*, *Taylor*, and *Ahlstrom* do not appear to remedy, nor did the Examiner rely on the above-references references to remedy, at least the deficiencies of *Yamashita* discussed above. Therefore, for at least these reasons, Applicants respectfully request that the rejection of Claims 3, 5-21 and 51-65 be withdrawn.

Of the remaining rejected claims, Claim 22 is independent. Claim 22 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamashita* in view of *Mahoney*. In the Office Action, the Examiner states that *Yamashita* does not disclose “searching for an image layout definition template that best matches the generated image layout definition” or “conforming the generated image layout definition to the best-matched image layout definition template” as recited by Claim 22 (Office Action, page 16). Applicants agree. However, the Examiner further states that *Mahoney* purportedly teaches the above-referenced limitations of Claim 22, and that it would have been obvious to combine the purported teachings of the *Yamashita* and *Mahoney* references to arrive at Applicants’ invention as defined by Claim 22 (Office Action, pages 16 and 17). Applicants respectfully disagree.

In the Office Action, the Examiner asserts that *Mahoney* discloses searching and identifying documents based on their makeup (Office Action, page 16). However, *Mahoney* does not appear to disclose, nor has the Examiner explicitly identified in *Mahoney*, “conforming the generated image layout definition to the best-matched image layout definition template” as recited by Claim 22. To the contrary, *Mahoney* appears to be limited to a “System for Searching a Corpus of Document Images” (*Mahoney*, Title). Therefore, for at least this reason, Applicants respectfully submit that Claim 22 is patentable over the *Yamashita* and *Mahoney* references.

Further, Applicants respectfully submit that there is no motivation or suggestion to combine the purported teachings of *Mahoney* with *Yamashita* as proposed by the Examiner. For example, in the Office Action, as a basis for combining the purported teachings of *Mahoney* with *Yamashita*, the Examiner states that it “provides the benefit of identifying documents (or regions thereof) with models (Office Action, page 17). As discussed above in connection with the rejection under 35 U.S.C. § 102 of independent Claims 1 and 48, the Examiner appears to indicate that *Yamashita* already discloses identifying and/or defining regions in an image (Office Action, pages 2 and 3). Thus, there appears to be no motivation or suggestion to combine the purported teachings of *Mahoney* with *Yamashita* at least because, at least according to the Examiner, *Yamashita* appears to already disclose what the Examiner is relying on in *Mahoney*. Accordingly, for at least this reason also, Applicants respectfully submit that Claim 22 is patentable over the *Yamashita* and *Mahoney* references.

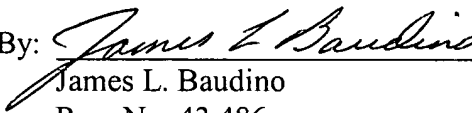
Accordingly, Applicants respectfully submit that independent Claim 22, and Claims 23-47 that depend therefrom, are patentable over the cited references.

**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicants have overlooked the need for any fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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